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The Internet Society Staff Code of Ethics and Business Conduct

1. Purpose & Scope

The Internet Society (ISOC) is a 501(c)(3) non-profit organization dedicated to promoting the open development, evolution, and use of the Internet for the benefit of all people throughout the world. ISOC is committed to pursuing its mission in accordance with the highest standards of ethics and integrity.

This “Staff Code of Ethics and Business Conduct Policy” (Code) sets out principles that govern how ISOC conducts business. ISOC’s Code of Ethics applies to all ISOC personnel around the globe, including employees—whether full-time or part-time—contractors, consultants, advisors, temporary help, and interns (collectively referred to as ISOC personnel or You). ISOC’s Ethics Committee is charged with overseeing the administration and enforcement of this Code.


The principles set out in this Code are not exhaustive. ISOC expects you to act ethically, with integrity, and in compliance with all applicable laws and ISOC procedures. If confronted with an ethical issue that is not covered by this Code, or if you have a question about this Code, contact the Legal Department at legal@isoc.org or the Compliance Director at for further guidance.

If you suspect a violation of ISOC’s Code of Ethics, you must report your suspicion to the Legal Department. Those who report suspected violations in good faith shall be protected from any form of retaliation. Those who violate ISOC’s Code of Ethics will be subject to appropriate disciplinary action by ISOC, including potential termination.

1.0 Overview: Ethics, Integrity, and Legal Compliance

All ISOC personnel must act with honesty, integrity and openness whenever they represent the organization. ISOC promotes a working environment that values respect, fairness and integrity.

Below is an overview of ethical and legal principles covered by the Code. These principles are discussed in greater detail below.

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Compliance with Laws – You shall comply with all applicable laws, regulations, and standards of government agencies and authorities in the jurisdictions where we operate. This Code includes a summary of some of the laws that apply to our operations. Always contact the Legal Department if you have a question about how applicable law applies to your activities on behalf of ISOC.

Inclusiveness and Diversity – You shall not directly or indirectly discriminate against or harass ISOC personnel, ISOC members, or others.

Gifts – You shall not seek any gifts, nor shall you provide any gifts above a nominal value in connection with your role at ISOC.

Conflicts of Interest – You shall avoid conflicts of interest and the appearance of conflicts of interest. When representing ISOC, you shall advance ISOC’s interests.


Anti-Bribery and Corruption – You shall not engage in any corrupt practices to secure an improper advantage for ISOC, yourself, our members, or other third parties. You shall ensure ISOC’s compliance with all anti-bribery and corruption laws by reporting any suspicious requests to the appropriate ISOC personnel.

Antitrust and Anti-competitive Practices – You shall exercise reasonable judgment to ensure that ISOC does not provide a membership environment that facilitates anticompetitive practices or conduct that otherwise violates antitrust laws.

Trade Controls – You shall adhere with all applicable trade controls and anti-boycott laws.

Credit Card Usage – You shall ensure that any corporate credit card issued to you by ISOC is used strictly for business purposes.

Confidentiality and Proprietary Information – You shall not disclose or otherwise make available to third parties any information marked as confidential or proprietary, or capable of being reasonably understood as confidential or proprietary. Upon termination of your employment at ISOC,

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you shall deliver to ISOC all confidential and proprietary information, and remove such information from any personal devices.

If you have any questions about how this Code applies to you, stop and contact the Legal Department to obtain guidance before acting.

2.0 Compliance with Laws

You shall comply with all applicable laws and regulations in the jurisdictions in which we operate. This Code discusses some of the laws that apply to our operations, but it does not contain a comprehensive summary of all laws that apply to ISOC or our personnel.

You should contact the Legal Department if you have a question about how applicable laws apply to your activities on behalf of ISOC. You must report suspected violations of applicable law. You may reach out through legal@isoc.org, directly to the General Counsel or Compliance Director, or through the EthicsPoint hotline.


Your Obligations: You shall comply with all applicable laws and regulations in the jurisdictions in which we operate.

3.0 Inclusiveness and Diversity

ISOC is an equal opportunity employer. ISOC does not discriminate in its hiring practices on the basis of protected personal characteristics. Protected personal characteristics include, but are not limited to, sex, gender, race, identity, culture, and religion. ISOC strives to maintain an open and inclusive environment that provides all personnel with equal access to information, development and opportunity.

ISOC's open and inclusive environment, free of discrimination and harassment, is integral to our success. ISOC leverages a rich diversity of cultural backgrounds, talents, and ideas to foster innovation and provide quality services.

You must treat all personnel, members, and others accordingly.

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Your Obligations: You shall not directly or indirectly of discriminate against or harass any ISOC personnel or members.

- (1) You shall not deny ISOC personnel, members, or others opportunities on the basis of protected personal characteristics;
- (2) You shall not hinder the career advancement of any ISOC personnel on the basis of protected personal characteristics;
- (3) You shall not circulate disparaging communications about any ISOC personnel or members on the basis of protected personal characteristics; and
- (4) You shall not otherwise engage in any malicious action that jeopardizes the inclusivity and diversity of ISOC's work environment.

4.0 Gifts

The provision and receipt of personal gifts, to or from third parties, may compromise ISOC's integrity or create the appearance of impropriety. Such conduct may give rise to a 'Conflict of Interest' (*see section 5.0*), or subject ISOC to penalties under various 'Anti-Bribery and Corruption' laws (*see section 6.0*). It is therefore ISOC policy that you do not accept personal gifts of goods or services in connection with your representation of ISOC, except under limited circumstances.


The term "gift" broadly refers to the transfer of any item of value, including goods and services, without compensation. The exchange of gifts of 'nominal value' (less than \$25.00) is acceptable if the exchange accords with generally accepted local customs, traditions, and laws and does not otherwise imply that the recipient return the favor (*see section 5.0*). For example, the following activities are generally permissible:

Gifts of nominal value given during a holiday season or other special occasions;

Reasonable business meals and entertainment as part of conducting meetings and maintaining relationships in the ordinary and customary course of business;

Acceptance of invitations to widely attended events; and

Acceptance of awards (of nominal value) for meritorious contributions or service.

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Gifts must never be used to obligate, or appear to obligate, the recipient to take any kind of action. You shall not seek or request gifts, or otherwise elicit preferential treatment in any matter, from any person or organization, through your position at ISOC.

Moreover, frequent gifts involving the same counterparty, including those below the \$25.00 threshold, may create a conflict of interest, or implicate anti-bribery and corruption laws. (See **sections 5.0** and **6.0**). Gifts of cash, cash vouchers, certificates with a set negotiable value or other cash equivalents are never acceptable.

If you have any questions about the propriety of your receipt or provision of a gift under this policy, speak to your supervisor or reach out to the Legal Department.


Your Obligations: You shall not seek any gifts, nor shall you provide any gifts above a nominal value.

- (1) Your receipt or provision of any items or services above a nominal value must be authorized by your Manager or Human Resources;
- (2) Your receipt or provision of any items or services above a nominal value shall be promptly and accurately recorded and reported; and
- (3) All gift-related activities shall otherwise comply with sections 5.0 and 6.0.

5.0 Conflict of Interest

The [Internet Society Conflict of Interest Policy](#), which is located within the Legal policies folder in the central policy and procedure repository PolicyTech, is intended to supplement, but not replace, laws governing conflicts of interest applicable to nonprofit corporations or trusts. This policy applies to all members of Internet Society staff. Staff members are expected to act in the Internet Society's best interest at all times and to exercise sound judgment unclouded by personal interests or divided loyalties.


Avoiding conflicts of interest is critical to maintaining integrity and honesty in the way ISOC conducts its business. Accordingly, ISOC makes it a priority that all actual or potential conflicts of interest be identified in advance, properly evaluated, and disclosed to

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appropriate individuals, and that mitigation plans, as necessary and appropriate, are properly documented and implemented.


You must never undermine ISOC's business interests for personal gain. You have a duty of loyalty to the organization and must make business decisions with ISOC's best interests in mind. You must exercise your business judgment independent of external influences, such as personal financial interests, external business relationships, outside employment, and familial relationships. Potential conflicts of interest arise when you engage in conduct that compromise your ability to objectively serve ISOC's best interests and mission, such as the following:

- You accept expensive gifts from a potential business partner;
- You accept employment by another company while employed by ISOC;
- You compete with ISOC, or otherwise take on outside responsibilities that detract from your ability to competently satisfy your duties at ISOC;
- You have a financial or ownership interest in a business partner;
- You are involved in business with any firm in which you, or an immediate family member, have a financial or ownership interest; and
- You have influence over the hiring, promotion, or compensation decisions of a family member or ISOC personnel with whom you maintain a special or romantic interpersonal relationship.

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Your Obligations: You shall avoid conflicts of interest and the appearance of conflicts of interest. When representing ISOC, you shall advance ISOC's interests. Accordingly,

1. **Outside Employment** You shall provide advanced notice to, and obtain or receive written approval from, Human Resources if you seek or obtain or continue any full or part-time employment opportunities with entities other than ISOC, including any self-employment opportunities;
 - a. ISOC's Human Resources Department shall not grant such approval if the outside employment is deemed to interfere, in management's judgment, with your responsibilities at ISOC, or otherwise creates a potential organizational conflict of interest;
 - b. You shall not conduct the business of any outside employment, even if approved by ISOC pursuant to the foregoing paragraph, during your work time at ISOC. Further, ISOC assets, including email, voice mail, fax, computers, copiers, and the like cannot be used in furtherance of non-ISOC business;
2. **Outside Boards** You shall disclose to Human Resources any plans to serve or continue to serve on the board of directors or trustees of any organization, for-profit or not-for-profit;
 - a. ISOC management shall make a determination as to whether such a position is in conflict with employment at ISOC;
3. **Financial Interests** You shall disclose to Human Resources any direct or indirect (including via family members) financial interest in ISOC's business partners;
 - a. For purposes of this paragraph, "financial interest" is, the lesser of an ownership interest of greater than 5% or \$25,000 in the entity at issue
 - b. You shall report to ISOC any direct or indirect financial interest in any other organization where such interest might create a conflict either for ISOC or for the staff member;
4. **Not For Personal Gain**
 - a. You shall not use ISOC property, information, resources or position for personal gain or to compete with ISOC in any way;
 - b. You shall not take or divert to any third party any business opportunity that is discovered through the use of any of ISOC's property, information, or resources.

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6.0 Anti-Bribery and Corruption

ISOC is committed to complying with anti-bribery and corruption (ABC) laws such as the U.S. Foreign Corrupt Practices Act (FCPA) and UK Bribery Act 2010 (UKBA).

This section provides an overview of how ABC laws work and guidance on compliance with ABC laws.

6.1 Definitions and Scope

For purposes of this Code, the term “bribery” generally refers to the act of giving something of value in order to induce favorable treatment. The term “corruption” refers to the abuse of power for private gain.


As a legal matter, the exact nature and scope of what constitutes a prohibited bribe or corrupt act differs across jurisdictions. The FCPA prohibits offering, promising, or giving anything of value to a foreign official to gain an improper business advantage. By contrast, the UKBA covers not only bribes to foreign officials, but also to private businesspersons. Although FCPA and UKBA primarily apply to those subject to U.S. or UK jurisdiction, respectively, application and enforcement of the FCPA and UKBA apply broadly to conduct that occurs outside of the United States and United Kingdom.

There are very limited exceptions to the FCPA and UKBA. Do not attempt to use or rely on legal exceptions to these rules without prior approval from the Legal Department. You must consult the Legal Department if you have any questions about the scope of applicable ABC laws.

6.2 Examples and “Red Flags”

What constitutes a “bribe” or a corrupt action under this policy is broad by default given the varying scope of ABC laws in different jurisdictions. Below is a non-exhaustive list of actions that may be considered a bribe or corrupt action:

- Providing expensive gifts to a government regulator charged with issuing permits;
- Offering employment or benefits to a friend or family member of a foreign official to influence an official act or decision;

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- Offering or receiving a kickback, loan, fee, or commission to a private official in exchange for a favor;
- Making contributions or donations to a foreign political party, candidate, or charitable organization.

Bribes or other corrupt actions arise in many different scenarios and may involve different parties. The party offering a bribe might be:

- A staff member, officer or director;
- Any person acting on behalf of ISOC (e.g., third parties);
- Individuals and/or organizations representing ISOC that authorize someone else to carry out these acts.

Targets for bribes may be government or public officials, including the following or their relatives:


- a public official, whether foreign or domestic;
- a political candidate or party official;
- a representative of a government-owned/controlled organization;
- an employee of a public international organization or non-governmental organization.

As discussed, certain ABC laws cover commercial bribery, and in which case the target of a bribe may be a private businessperson.

Since actions taken on behalf of ISOC can expose ISOC to liability under ABC laws, you must exercise proper due diligence when establishing or renewing contracts/agreements. If required, certain provisions should be included in the contract regarding compliance with appropriate laws, particularly in the case where the third party will be dealing with government officials.

6.3 Your Duties and Responsibilities

Violations of the FCPA, UKBA, or other ABC laws expose ISOC to substantial legal and commercial penalties, including fines and penalties, reputational damage, and loss of opportunities. ISOC has a zero-tolerance approach toward bribery and corruption, both of which are criminal offenses.

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Your Obligations: You shall not engage in any corrupt practices to secure an improper advantage for ISOC, yourself, our members, or other third parties. You shall ensure ISOC's compliance with all anti-bribery and corruption laws by reporting any suspicious requests to the appropriate ISOC personnel.

- (1) You shall not offer, promise or give a bribe to anyone. And you shall not request, agree to accept, or accept a bribe from anyone;
- (2) You must seek authorization from the Compliance Director before engaging in any transactions involving a foreign official;
- (3) You must completely and accurately record all dealings involving a foreign government official;
- (4) You must promptly reject and report any suspicious requests for falsified documentation;
- (5) You shall to ensure that ISOC is complying with applicable ABC laws, and you shall contact the Compliance Director at legal@isoc.org with any questions about conflicting ABC provisions.


7.0 Antitrust and Anti-Competitive Practices

7.1 ISOC's Mission, Antitrust and Anti-Competitive Practices

ISOC is an association of members that stands for the development and evolution of internet services through innovation and quality enterprise. Unfair business practices contravene that purpose. ISOC shall structure its service environment so as to provide a forum that promotes fair competition amongst membership, and discourages the kind of unfair or illegal practices that implicate antitrust laws.

U.S. antitrust laws are enforced by the U.S. Department of Justice and are meant to promote free trade and fair competition. The focus and intent behind U.S. antitrust law aligns with ISOC's mission to promote the development of Internet infrastructure across the globe in an open, secure, and trustworthy manner. In addition to structural safeguards, the ISOC Code requires that you use reasonable judgment in day-to-day activities to ensure that ISOC does not facilitate violations of antitrust law.

7.2 Antitrust Overview and Your Responsibilities

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U.S. antitrust enforcement focuses on mitigating unfair collusion and dealings that unreasonably foreclose market access. Collusion broadly refers to efforts between market participants to artificially influence the market to secure an unfair advantage. Such efforts can take many forms, including price fixing, which are express or implied agreements between companies to deal in products or services at a fixed price, or to manipulate market conditions so as to artificially control supply and demand.

ISOC shall not be a forum for or otherwise facilitate member companies from taking unfair advantage of other companies, employees, or the marketplace through dishonesty, manipulation, misrepresentation, concealment, or any form of unfair dealing. Do not discuss price fixing or other strategic points that may present opportunities for unfair collaboration with non-ISOC individuals or entities to the unfair detriment of third party market participants. Do not engage in any conduct in furtherance of a boycott of third party market participants. Conduct that has the purpose or effect of fixing prices or boycotting third party market participants, for example, are considered unreasonable *per se* under U.S. antitrust laws.

Misappropriation of a company's proprietary or confidential information or trade secrets, or attempts to induce unauthorized disclosure of such information from past or present employees of other companies, is strictly prohibited. Lawful sources of competitive intelligence include public sources such as market reports, webpages, and journalist publications. Unlawful sources of competitive intelligence include private sources such as those obtained, or divulged, in breach of a duty of confidentiality.

Do not discuss or exchange sensitive, confidential information with non-ISOC individuals or entities. ISOC requires all personnel to comply with all applicable laws in acquiring competitive intelligence.

You must also discourage and report any anti-competitive practices. Since violations of U.S. antitrust law may arise through disparate actions taken over time, merely refraining from prohibited conduct is not sufficient.

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You must notify your Manager of any suspicions of conduct that may subject ISOC antitrust law violations. Moreover, you must notify your Manager of receipt of any information that you reasonably believe may be confidential or proprietary to another organization.

Your Obligations:

- (1) You shall not engage in any action that has the purpose or effect of fostering anticompetitive conditions in the marketplace.
- (2) You shall not illegally obtain or use confidential and proprietary information.
- (3) You shall exercise reasonable care in ensuring ISOC operations promote an open and trustworthy market environment
- (4) You shall promote suspicious activities to your Manager.


8.0 Trade Controls

ISOC's global operations are subject to trade controls imposed by the United States and other jurisdictions. ISOC is committed to complying with all applicable trade controls. This section presents a brief overview of various economic sanctions, export controls, anti-boycott laws, and other cross-border laws and regulations applicable to ISOC operations. Following the overview is a non-exhaustive list of your duties and responsibilities under applicable trade controls.

8.1 Economic Sanctions

Generally, the United States and other jurisdictions maintain two types of economic sanctions programs: (1) restrictions that target countries, territories, or regions (known as embargoes), and (2) restrictions that target specific individuals or entities and their property interests (known as prohibited party restrictions).

Embargoes

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The United States currently maintains embargoes on several destinations. Embargoes with the most comprehensive set of restrictions are imposed on **Cuba, Iran, North Korea, Syria, Crimea**, and the separatist regions of the **Donetsk** People’s Republic and the **Luhansk** People’s Republic of Ukraine. Although each program is unique, comprehensive embargoes typically prohibit, or severely restrict, all trade and dealings with the targeted country or territory without prior government approval. Embargoes generally apply to the governments of, persons in, companies based, and persons ordinarily resident in embargoed territories.

Dealings with **Russia, Belarus, Burma** (Myanmar), **Venezuela**, and other countries are subject to extensive sanctions, but are not technically subject to full embargoes.

Prohibited Parties

Various governments restrict or prohibit dealings with lists of individuals, companies, entities, and other parties that are deemed to pose a national security or foreign policy threat. Dealings with these “prohibited parties” may be entirely prohibited or subject to significant restrictions.


8.2 Export Controls

U.S. and other export control regulations restrict the ability of ISOC to export, reexport, or transfer of certain goods, software, and technological knowhow (collectively referred to as “items”) to certain countries. Making certain sensitive software or technology available to foreign nationals located in the United States or elsewhere is “deemed” to be exported to the foreign national’s home country. Whether prior government approval is required for exports, reexports, and transfers of items depends on the sensitivity of the item at issue and the foreign destinations (or nationals) involved.

ISOC is responsible for ensuring that any items that ISOC intends to export, re-export, or transfer comply with export control requirements.

8.3 Anti-Boycott Regulations

The U.S. Commerce Department and Internal Revenue Service administer regulations that prohibit compliance with the Arab League boycott of Israel, and other boycotts that are not


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recognized by the United States. As a practical matter, anti-boycott issues arise when Israel comes up in discussions with a third party about a matter that is not related to Israel. For example, a request that services provided by ISOC not involve Israel or Israeli nationals would implicate U.S. anti-boycott regulations.

ISOC is generally prohibited from taking any action that supports the Arab League boycott of Israel, or other unrecognized boycotts and generally must report boycott requests received from third parties to the U.S. government. You must consult the Legal Department before taking any action with respect to “anti-boycott” red flags.

8.4 Your Duties and Responsibilities

In accordance with the above, you shall not engage in any of the actions listed below without prior or specific authorization from ISOC’s General Counsel or Compliance Director. Failure to comply with applicable trade control laws could subject you and ISOC to significant penalties, including criminal prosecution.


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Your Obligations:

- (1) You shall comply with all applicable trade controls and anti-boycott laws and any guidelines provided by ISOC;
- (2) You shall not engage in, or authorize, any transactions or dealings involving an embargoed destination or prohibited party without obtaining prior approval from the General Counsel or Compliance Director;
- (3) You shall immediately report any existing or proposed engagements that directly or indirectly involve an embargoed destination or prohibited party to the General Counsel or Compliance Director;
- (4) You shall not export, reexport, or transfer any item to a foreign destination or foreign national without required government licenses or approvals;
- (5) Shall not assist or facilitate another person with a dealing, transaction, export, reexport, or transfer that you could not legally conduct yourself, including activities involving a prohibited party or embargoed destination, without prior approval from the General Counsel or Compliance Director; and
- (6) Immediately report the receipt of a request to comply with an unsanctioned boycott to the General Counsel or Compliance Director immediately and take no further action until further guidance is provided.

9.0 Credit Card Usage

ISOC will issue corporate credit cards to certain staff members where the nature of their job requires such use. The use of corporate credit cards is a privilege, which ISOC may withdraw for any reason, including in the event of abuse. [Internet Society Corporate Credit Card Policy](#) has been established to ensure corporate credit cards are used for appropriate purposes and adequate controls are established for their usage.

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Violations of the established policy will result in disciplinary action, up to and possibly including termination of employment, depending on the severity of the offense.

Your Obligations: You shall ensure that any corporate credit card issued to you by ISOC is used strictly for business purposes.


10.0 Confidentiality and Proprietary Information

ISOC considers the privacy of our donors, members, staff and board and the organization itself to be of paramount importance. ISOC possesses—whether marked as confidential or capable of being reasonably understood as confidential—information that has been created, developed or disclosed to ISOC personnel and the board under the obligation of confidentiality.

“Confidential Information” includes, but is not limited to, information in written or electronic form, or communicated orally. Examples of “Confidential Information” include, but are not limited to, ISOC operating plans, strategy plans, marketing and service plans, financial data, member and prospect data, company reports, contracts, personnel data and salary information and estimating cost structures and related information.

You must maintain and protect confidential and proprietary information from unauthorized disclosure. You shall treat information that is not publicly available as confidential, and you shall not disclose confidential information to third parties. You shall keep such information obtained or developed while employed by ISOC in strictest confidence, both during and after your employment or affiliation with ISOC.

Nothing in this policy is intended to restrict or limit in any way your rights to discuss the terms and conditions of your employment with other ISOC personnel or with third parties. ISOC’s policy is intended to protect Confidential Information, including confidential personnel information, from disclosure.

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Upon termination of your employment, or earlier, if so requested by ISOC, regardless of the timing, reasons, or circumstances of the termination, you must deliver to ISOC all materials, documents, and other tangible or intangible storage media containing any form of Confidential Information, whether located on ISOC's premises or elsewhere. You will be required to attest that all ISOC Confidential information has been removed from your personal devices.

If you have any questions about handling and protecting of confidential and proprietary information, speak to your Manager or contact Human Resources for assistance.

Your Obligations: You shall not disclose or otherwise make available to third parties any information marked as confidential or proprietary, or capable of being reasonably understood as confidential or proprietary. Upon termination of your employment at ISOC, you shall deliver to ISOC all confidential and proprietary information, and remove such information from any personal devices.

11.0 Reporting Concerns

11.1 Making a Report


At the Internet Society we support open and honest communication. Whenever you have a concern, you are encouraged to speak up. You must immediately report any known or suspected violations of this Code. Failure to promptly report a known or suspected violation could result in disciplinary action, up to and including termination of employment.

Reports may be made to the Legal Department (legal@isoc.org) or to the [EthicsPoint Hotline](#) online or by phone (phone numbers available on the webpage).

The Hotline is available 24 hours a day 7 days a week, and reporters have the option to submit their report anonymously if they choose.

The following individuals collectively comprise the ISOC Ethics Committee and are also available to receive reports of actual or potential Code violations.

- President and CEO


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- General Counsel
- Managing Director

When you make a report through any of the resources above, any information you provide is kept as confidential as possible. You should contact legal@isoc.org if you have any questions about the Code and when in doubt about the best course of action in a particular situation.

11.2 Zero Tolerance for Retaliation

No retribution or retaliation will be taken against any ISOC employee who has filed a report based on a good faith belief of an actual or potential violation of this Code. Similarly, no retribution or retaliation will be allowed toward any staff member who has cooperated with an investigation concerning an actual or potential Code violation. Any person who takes (or attempts to take) retaliatory action against a staff member who reported an incident shall be subject to appropriate disciplinary action, up to and including demotion and termination of employment.

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CERTIFICATION OF COMMITMENT TO INTERNET SOCIETY

STAFF CODE OF ETHICS AND BUSINESS CONDUCT POLICY

I, _____, certify that I have received the Internet Society Staff Code of Ethics and Business Conduct Policy. I understand that I have a continuing obligation to adhere to the expectations of the Internet Society and will conduct my business and professional affairs in an ethical manner in compliance with the Code and guidelines developed by ISOC. I recognize that failure to comply with the provisions of the Code and uphold the Internet Society's ethical principles may subject me to disciplinary action, up to and including termination of my employment.


I will report any Conflicts of Interest that arise during my tenure with Internet Society and submit a Conflict of Interest statement once a year if required.

As a staff member of the Internet Society, I will conduct myself with integrity and with the highest of standards.

I agree to comply with and enforce the Code of Ethics in its entirety, at all times.

Signature: _____ Date: _____

Print Name: _____

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FAQ's

The following list of illustrative examples is being provided to assist staff in order to provide guidance on frequently asked questions so they many remain in compliance. It is imperative that if you have questions that you reach out to your manager or Human Resources for guidance.

Example 1: *Tom works in the ISOC office supply procurement Team. Tom has been charged with replacing all ISOC staff work desks with contemporary workstations. Tom knows ISOC's protocol is to place this significant contract out for a bidding process and to select the best vendor among three candidate vendors.*


Tom recalls, however, that at a recent conference he met Joe from Galaxy Office Environments. At a happy hour event during the conference, Joe told Tom that he often secures World Cup tickets for his better clients. Tom has been hoping to make it to the upcoming World Cup games as his country has qualified and he wants to see them play. Tom decides he will call Joe and give him some inside information just to be sure that Galaxy wins the bid.

- Tom is not breaching the Code. World Cup tickets are entertainment and these kinds of arrangements are common.*
- Tom is breaching the Code. He is not following in good faith the bidding protocol by supplying one business partner with additional information. Tom also has a conflict of interest.*
- It is not clear. The Code does not expressly address the issue so Tom can probably get away with it.*

The correct answer is b because Tom is not following the bidding protocols by keeping all of the vendors on the same equal footing in terms of information and therefore the process now lacks integrity. In addition, Tom has a conflict of interest because he is putting his personal interest (of going to World Cup) over that of ISOC's (selecting the best vendor).

Example 2: *Manager Zach works as a real estate broker in his spare time. He routinely communicates with his clients on his personal cell-phone during the day. At times, he uses ISOC's fax machine and computer to conduct his real estate business but he is careful to do this during his lunch break and after business hours. Has Zach violated the Code?*

- Yes, Zach is using company assets for a personal business rather than ISOC business.*
- No, as long as he continues to use the fax and computer during lunch and after business hours.*

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- c. *No, because he once asked his supervisor if he could “quickly use” the fax and computer to complete a real estate deal and his boss said he “did not care.”*

The correct answer is a The computer and fax are for ISOC business use only. While incidental use of these assets for personal use is acceptable, such assets should not be routinely used for non-ISOC business even if such use is approved on a one-time basis.

Example 3: *Staff member John’s wife Susan recently decided to start a software development company. John is a manager in the finance department and the finance unit has declared the need to find a new software vendor to develop financial reporting capability. John has been given the responsibility to find the best vendor for the company. John knows the usual process is to get quotes from several vendors and to retain the vendor that is best for the company. In this instance, however, John believes this is an excellent opportunity to help his wife’s new business venture and, because of how well he knows Susan and her talents, he is confident she will do a good job for the company. Has John violated the Code?*


- a. *No, he has much better knowledge of Susan’s capabilities and her integrity. Retaining Susan is a safe bet for the company.*
- b. *Yes, John has a conflict of interest and he has not reported this matter to his manager.*
- c. *Yes, John has failed to follow the protocol for hiring a vendor.*

Answer: Both b and c are correct. John should alert his manager or Human Resources to the fact that his wife owns a company that may be a possible match for the ISOC’s need and this will provide ISOC with the ability to identify another decision maker for the vendor selection process. John’s attempt to take a short cut in the vendor selection process is also a breach of the Code given that the process is an ISOC requirement.

Example 4: *Staff member John owns shares of stock in an IXP Company. On behalf of ISOC, John provides technical and financial support to this IXP Company. Does John need to report his stock ownership?*

- a. *No, his shares are insignificant compared to the total value of the IXP Company.*
- b. *Yes, John’s financial interest in the IXP Company could be perceived by a third party to jeopardize his objectivity when performing his duties.*

Answer: b is correct. John should alert Human Resources to the fact that he owns stock in a company that does business with ISOC. Human Resources should then determine whether the amount of stock is significant or not.

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Example 5: *Stephen enters an elevator with his co-worker Ralph and there are other people in the elevator that do not work for ISOC. As they enter the elevator, Ralph continues discussing the details of ISOC's audited financial data. What should Stephen do?*

- a. *Continue discussing the project so as not to be rude to Ralph.*
- b. *Politely say to Ralph, "Let's discuss this when we get back to the office."*
- c. *Just ignore Ralph and not say anything.*

The correct answer is b. Stephen's comment to Ralph will help Ralph remember his duty to keep ISOC information confidential.